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September 27, 2017

VIA FACSIMILE (856) 757-6846

Honorable Karen M. Williams
United States District Court
1 John F. Gerry Plaza,
Fourth & Cooper Streets
Camden, NJ 08101

Re: Pavlak, et al. v. Realty Income Properties 29, LLC
Civil Action No. 1:17-cv-06428 (RMB/KMW)
Initial Conference Scheduled: 2 p.m. September 28, 2017

Dear Judge Williams:

We represent Defendant Realty Income Properties 29, LLC (“Defendant”) in the referenced matter. We write with respect to the initial conference scheduled before Your Honor for 2 p.m. on September 28, 2017.

This matter involves alleged public access issues with premises owned by Defendant which Plaintiffs allege violate the Americans with Disabilities Act and the New Jersey Law Against Discrimination. Your Honor entered an order scheduling the initial conference on August 25, 2017. Subsequently, Defendant sought a pre-motion conference before Judge Bumb to address a proposed motion to dismiss Plaintiffs’ complaint based on Plaintiffs’ alleged failure to sufficiently plead their claims. In response to Defendant’s request, Plaintiffs agreed to submit an amended complaint with more specific allegations detailing the alleged access issues with the property. On September 22, 2017, Judge Bumb entered an order requiring Plaintiff to submit a proposed amended complaint within 20 days (i.e. prior to October 12, 2017).

In light of the fact Plaintiffs have not yet filed an amended complaint setting forth specific allegations of the alleged access issues on Defendant’s property, we to inquire as to whether the Court still wants the parties to appear for the initial conference on September 28, 2017, or if the Court would prefer to adjourn the initial conference to a date after Plaintiffs’ have filed their amended complaint.

Honorable Karen M. Williams, U.S.M.J.
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We thank the Court for its courtesies with respect to this matter.

Respectfully submitted,

JACKSON LEWIS P.C.



Joseph C. Toris

JCT:da

cc: Anthony J. Brady, Jr. (Via ECF)